

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PATRICIA LOWRY, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

RTI SURGICAL HOLDINGS, INC.,
CAMILLE I. FARHAT, BRIAN K.
HUTCHISON, JONATHON M. SINGER,
ROBERT P. JORDHEIM, and
JOHANNES W. LOUW,

Defendants.

Civil Action No. 1:20-cv-01939-MFK

CLASS ACTION

Hon. Matthew F. Kennelly

**MOTION OF ROSY YERETSIAN FOR APPOINTMENT AS LEAD PLAINTIFF AND
APPROVAL OF SELECTION OF LEAD COUNSEL**

Movant Ms. Rosy Yeretsian (“Ms. Yeretsian”), by and through her counsel, hereby moves this Court, pursuant to Section 21D(a)(3) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), for an Order: (1) appointing Ms. Yeretsian as Lead Plaintiff on behalf of a class (“Class”) consisting of all persons or entities who purchased or otherwise acquired the securities of RTI Surgical Holdings, Inc. from March 7, 2016 through March 16, 2020, both dates inclusive; and (2) approving Ms. Yeretsian’s selection of Pomerantz LLP (“Pomerantz”) and Roche Cyrulnik Freedman LLP (“RCF”) as Co-Lead Counsel for the Class.

Ms. Yeretsian, as the proposed Lead Plaintiff, has timely filed her motion pursuant to the PSLRA and is believed to be the investor with the largest financial interest in the outcome of the litigation. The proposed Lead Plaintiff meets the requirements of the PSLRA and Fed. R. Civ. P.

23 in that her claims are typical of the claims of the class, and she will fairly and adequately represent the interests of the class. The proposed Lead Plaintiff's choice of counsel should be accepted by this Court because the proposed Lead Plaintiff's selected counsel, Pomerantz and RCF, are firms with extensive experience and expertise in securities fraud and other class actions.

In further support of this Motion, Ms. Yeretsian relies on the accompanying Memorandum of Law, as well as the Declaration of Jeremy A. Lieberman and the exhibits appended thereto, filed herewith.

WHEREFORE, Ms. Yeretsian respectfully requests that the Court issue an Order: (1) appointing Ms. Yeretsian as Lead Plaintiff for the Class; and (2) approving her selection of Pomerantz and RCF as Co-Lead Counsel.

DATED: May 22, 2020

Respectfully submitted,

POMERANTZ LLP

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(*pro hac vice* application forthcoming)
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(pro hac vice application forthcoming)

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*Counsel for Lead Plaintiff Movant Rosy
Yeretsian and Proposed Co-Lead Counsel
for the Class*

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*Additional Counsel for Lead Plaintiff
Movant Rosy Yeretsian*